

Exhibit D

Heather Hacker

From: Martin, Meghan C. <Meghan.Martin@arnoldporter.com>
Sent: Wednesday, December 21, 2022 2:35 PM
To: Amanda Byrd; Jennifer Rowell; Carrie Killion; Heather Hacker; Jason Osowski; Janice Garrett; Andrew Stephens; Michael Moore; Amy Hilton; Ana Aranda; Eugenia Krieg; Rhonda Rodriguez; Drew Wright; Christopher Hilton
Cc: Ramer, Paula; Hodges, Catherine; Lollar, Tirzah; Margolis, Craig D.; Winter, Zachary
Subject: RE: US ex rel Doe v. Planned Parenthood - Affiliate Defendants' Eighteenth Production

"Amanda --

Thanks for flagging this. Overlay files with those documents were inadvertently not sent last month. I am sending via Kiteworks immediately.

Meghan

Meghan Martin
Attorney and Advisor | [Bio](#)

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From: Amanda Byrd <Amanda.Byrd@oag.texas.gov>
Sent: Wednesday, December 21, 2022 12:39 PM
To: Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Jennifer Rowell <Jennifer.Rowell@oag.texas.gov>; Carrie Killion <Carrie.Killion@oag.texas.gov>; heather@hackerstephens.com; Jason Osowski <Jason.Osowski@oag.texas.gov>; Janice Garrett <Janice.Garrett@oag.texas.gov>; andrew@hackerstephens.com; Michael Moore <Michael.Moore@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Ana Aranda <Ana.Aranda@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Rhonda Rodriguez <Rhonda.Rodriguez@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>
Cc: Ramer, Paula <Paula.Ramer@arnoldporter.com>; Hodges, Catherine <Catherine.Hodges@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Winter, Zachary <Zachary.Winter@arnoldporter.com>
Subject: RE: US ex rel Doe v. Planned Parenthood - Affiliate Defendants' Eighteenth Production

External E-mail

Counsel, we have reviewed your document productions to date and have identified the following documents as outstanding. These documents are designated as "redacted" the privilege log but have not yet been produced. Please produce these documents by the end of the day.

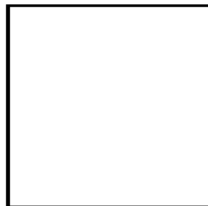
PPGT00015864
PPGT00048251

PPGT00085435
PPGT00097942
PPGT00097965
PPGT00097977
PPGT00097989
PPGT00103237
PPGT00103244
PPGT00116922
PPST00068909

Best,

Amanda C. Byrd
Assistant Attorney General
Civil Medicaid Fraud
512-936-1304

From: Martin, Meghan C. <meghan.martin@arnoldporter.com>
Sent: Sunday, December 18, 2022 9:11 PM
To: Jennifer Rowell <Jennifer.Rowell@oag.texas.gov>; Carrie Killion <Carrie.Killion@oag.texas.gov>;
heather@hackerstephens.com; Jason Osowski <Jason.Osowski@oag.texas.gov>; Janice Garrett
<Janice.Garrett@oag.texas.gov>; andrew@hackerstephens.com; Michael Moore <Michael.Moore@oag.texas.gov>; Amy
Hilton <Amy.Hilton@oag.texas.gov>; Ana Aranda <Ana.Aranda@oag.texas.gov>; Eugenia Krieg
<Eugenia.Krieg@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Rhonda Rodriguez
<Rhonda.Rodriguez@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Christopher Hilton
<Christopher.Hilton@oag.texas.gov>
Cc: paula.ramer@arnoldporter.com; catherine.hodges@arnoldporter.com; tirzah.lollar@arnoldporter.com;
craig.margolis@arnoldporter.com; zachary.winter@arnoldporter.com
Subject: RE: US ex rel Doe v. Planned Parenthood - Affiliate Defendants' Eighteenth Production



meghan.martin@arnoldporter.com sent you a secure
message

Access message

Counsel:

Attached please find Affiliate Defendants' eighteenth Production. Attached are the passwords. Please let me know if you have any issues accessing the data.

Also attached is a REVISED Third Privilege Log that contains completed PRODBEG and REDACTION columns. It has been designated as AEO because of non-public PP employee names and emails.

If you are not sending these straight to your edata vendor, you may need to use a tool such as 7-zip or WinZip to open the encrypted zips, instead of just using Windows. Please let me know if you have any questions

Meghan Martin (she/her)

Attorney and Advisor | [Bio](#)

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Attachments expire on Jan 18, 2023



3 PDFs

2022-12-18 FTP Login Information.pdf, 2022-12-18 - Affiliate Defendants' Production Letter to Texas and Relator.pdf, Affiliate Defendants REVISED Third Priv Log (12-18-2022) - FINAL (AEO).pdf

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